

Exhibit 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: :
WOOD, : Docket #20cv2489
 : 1:20-cv-02489-LTS-GWG
 :
Plaintiff, :
 :
- against - :
 :
MIKE BLOOMBERG 2020, INC., :
 : New York, New York
Defendant. : December 15, 2020
 :
----- : TELEPHONE CONFERENCE

PROCEEDINGS BEFORE
THE HONORABLE GABRIEL W. GORENSTEIN,
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

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2 confirm that, Ms. Bloom, is that the big burden, ESI?

3 MS. BLOOM: Yes. Yes, Your Honor. And if our
4 papers are not clear with regard to a stay, what we're
5 asking the Court for is a stay as to ESI discovery
6 that requires identification of custodians and then
7 the application of search terms. So, yes, it is the
8 ESI which based on the discovery requests that were
9 served and what the plaintiffs have indicated that
10 they were looking for, will be, the burden will be 100
11 percent on the defendant. And I can give you some
12 quantification of that if that would at all be useful,
13 but --

14 THE COURT: Well we're not there yet, we're
15 not there yet, because what I'm trying to do, and it
16 may not work, is to explore, given that, you know,
17 both sides have a lot to lose here, whether some path
18 can be found short of, you know, the full ESI, that
19 can let us limp along for what might be a few months
20 until we get a decision on the motion to dismiss. I
21 mean is there any, it seems to me both sides should be
22 incentivized to figure this out. And I -- I am not
23 creative enough in terms of discovery to figure out
24 maybe there is some aspect of ESI, I know you're
25 (indiscernible) mailboxes of the plaintiffs and that's

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2 me, but it seems to me that's exactly what the two of
3 you might discuss if you want to avoid kind of what
4 may be the all or nothing for my decision.

5 So my question is, Ms. Aaron, do you want the
6 chance to talk about it and see if you can, you know,
7 decided on something that could stretch this out for,
8 I mean I think it's going to have to be at least, I
9 don't imagine Judge Swain is going to have anything
10 out, you know, tomorrow or the next day or perhaps
11 even in the next month, just looking at other cases
12 and where she is in her schedule. I mean obviously I
13 don't know. But we have to assume the possibility
14 that it could be several months.

15 So, you know, taking us out for a two weeks I
16 don't think will solve it. Taking us out for a few
17 months might solve it. So if you think we could get
18 to that point, then it would be worth seeing if you
19 could work out something with the other side. And in
20 order to take us down a few months, who knows, you
21 might bargain for some kind of ESI that isn't
22 burdensome, I don't know if it exists, but I'm
23 assuming the parties are more creative about this than
24 I could ever be. But it would have to take us out for
25 a few months I would think for it to be of any value,

C E R T I F I C A T E

I, Carole Ludwig, certify that the foregoing transcript of proceedings in the United States District Court, Southern District of New York, Wood versus Mike Bloomberg 2020, Inc., Docket #20cv2489, was prepared using PC-based transcription software and is a true and accurate record of the proceedings.

Signature Carole Ludwig

Carole Ludwig

Date: December 18, 2020